

**UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF TEXAS
PECOS DIVISION**

UNITED STATES OF AMERICA,)	NO. 4:19-CR-774
)	
v.)	(Judge Counts)
)	
THOMAS ALAN ARTHUR,)	
)	
Defendant.)	

**UNITED STATES' PROPOSED JURY INSTRUCTION
ON FORFEITURE OF PROPERTY**

COMES NOW, the United States of America, by and through the United States Attorney for the Western District of Texas, and through the undersigned Trial Attorney and Assistant United States Attorneys, and hereby submits this Proposed Jury Instruction as related to the asset forfeiture portion of this trial

Upon review of the Court's proposed Jury Instructions it came to the United States attention that there was not an instruction as to the stipulations by the parties regarding the asset forfeiture portion of the trial.

The United States requests the addition of the below instruction, and further requests that the below instruction be placed after the Court's "EVIDENCE AND INSTRUCTIONS FROM TRIAL" instruction, or wherever the Court may see fit.

**UNITED STATES' PROPOSED FORFEITURE INSTRUCTION NO. 8
(FACTS STIPULATED BY THE PARTIES)**

I also instruct you that the parties have agreed to the following stipulations:

1. The parties have stipulated that the Defendant, Thomas Alan Arthur is the titled co-owner of the real property located and situated at 1260 Angel Road, Alpine,

Brewster County, Texas, 79830, with all buildings, appurtenances, and improvements thereon and any and all surface and sub-surface rights, title, and interests, if any, as more fully described in the Court's instructions.

2. The parties have stipulated that the property described above was the primary physical location used by the Defendant, Thomas Alan Arthur, to facilitate the management and operation of the following businesses:
 - a. Mr Double, Inc.;
 - b. M. Double, Inc. doing business as AOK Contractors;
 - c. Spring Creek Productions;
 - d. SC Prod., Inc.
3. The parties have stipulated that each of the above listed businesses were associated with and/or utilized the website: www.mrdouble.com.
4. The parties have stipulated that the real property described above was the primary physical location used by the defendant, Thomas Alan Arthur, to facilitate the management and operation of the following website: www.mrdouble.com. The real property described above, housed electronic equipment used to manage and operate the website/domain name that was owned by the defendant Thomas Alan Arthur.
5. The parties have stipulated that from June 21, 1998 to November 7, 2019, the website, www.mrdouble.com, and the above listed businesses were the sole source of income for the defendant, Thomas Alan Arthur.
6. The parties have stipulated that the above listed website, www.mrdouble.com, was the website used to host content charged in counts 1 through 9 of the Second Superseding Indictment.

7. The parties have stipulated that all the property described in these instructions, were seized at the real property described above.
8. The parties have stipulated that except for the \$2,270, more or less in U.S. Currency, the Canon digital camera, and the box of VHS tapes, all of the personal properties listed in the Second Superseding Indictment facilitated the operation and management of the website, www.mrdouble.com.

Respectfully submitted,

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/s/

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CERTIFICATE OF SERVICE

I hereby certify that on this 16th day of January, 2021, a true and correct copy of the foregoing document was electronically filed with the Clerk of Court using the CM/ECF system, which will transmit notification of such to the following CM/ECF participants:

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